



May 26, 2021

**VIA ELECTRONIC FILING**

The Honorable Jocelyn G. Boyd  
Chief Clerk/Executive Director  
Public Service Commission of South Carolina  
101 Executive Center Dr. Suite 100  
Columbia, South Carolina 29210

**Re: Docket No. 2019-226-E, *South Carolina Energy Freedom Act (House Bill 3659)*  
*Proceeding Related to S.C. Code Ann. Section 58-37-40 and Integrated Resource*  
*Plans for Dominion Energy South Carolina, Incorporated.***

Dear Ms. Boyd,

On behalf of the Sierra Club, we are writing to respond directly to Dominion Energy South Carolina, Inc.'s ("DESC") May 24, 2021, comments, which were in response to the Office of Regulatory Staff and the Joint Comments submitted by the South Carolina Coastal Conservation League and Southern Alliance for Clean Energy, Carolinas Clean Energy Business Alliance, Inc. and the Sierra Club, (collectively, "Intervenors") regarding DESC's Modified 2020 IRP.

Sierra Club will only address two issues raised in DESC's comments due to the short timeframe and the statutory deadline for the Commission to issue a final decision in this matter. However, our decision not to address any other issue raised by DESC is not an acceptance of those comments. The Sierra Club stands behind the Joint Comments submitted by the Intervenors.

**1. PSC Ordered Coal Docket**

DESC states in its comments that it is premature to open the coal docket because it needs to wait for the final results of its Transmission Impact Analysis ("TIA").<sup>1</sup> This Commission stated that it would open a coal docket to "assess the retirement and replacement of the Company's coal plants," "in order for the Company to meet the December 31, 2025, deadline" to retrofit the Williams and Wateree coal-fired plants to meet the federal Effluent Limitation Guidelines ("ELG") rule.<sup>2</sup> In other words, the Commission wanted to ensure that a proper coal economic analysis was done *prior to* locking ratepayers in to major capital investments in the Williams and Wateree coal plants.

DESC is facing an upcoming deadline of October 13, 2021, to inform the permitting authority (South Carolina Department of Health and Environmental Control) of its intention to

---

<sup>1</sup> DESC May 24, 2021 comments at 7.

<sup>2</sup> Docket No. 2019-226-E - Order No. 2020-832 ("Final Order") at 40.

retire the Wateree and Williams coal plants by December 31, 2028, in lieu of compliance with the ELG rule.<sup>3</sup> Failure to meet this deadline could lead Dominion to make potentially imprudent investments at the Wateree and Williams plants, costing ratepayers millions of dollars unnecessarily when it could instead retire those plants by December 2028. It is unclear how DESC will be able to complete its Commission-ordered coal economic analysis in the next five months if it insists on first completing the TIA for both Wateree and Williams. The purpose of the coal docket, once opened, would be to establish a schedule for the completion of the coal economic studies. Without a schedule, DESC will continue to drag its feet and maintain its current schedule of completing the Wateree analysis by the end of 2021 and Williams by the end of 2022. If DESC continues on this current schedule, without Commission intervention, DESC will miss not only its EPA-ordered deadline of declaring the retirement of the coal plants, but also this Commission's deadline of having the analysis done by the 2022 IRP. Sierra Club respectfully requests that the Commission immediately open the coal docket and implement a scheduling order to ensure the coal economic analysis are done in a timely fashion to meet all deadlines.

## 2. Combustion Turbine Plan ("CT Plan")

DESC states that it did not model the CT Plan because it is not a "long-term resource planning decision" and "not the sort of change that would materially affect the reserve margin analysis or need for additional generation."<sup>4</sup> What DESC fails to mention in its response is that the CT Plan does not just swap out old combustion turbines for new ones: it adds 85MW of additional capacity to DESC's system. Under DESC's theory, how much additional capacity would trigger "the sort of change that would materially affect the reserve margin analysis or need for additional generation?" That additional new capacity could have impact on coal retirement dates, or the need for additional capacity beyond 2028 (RP8 model results show new combustion turbine capacity added in 2028 and beyond).

If DESC knew it was going to add 85 MW of additional capacity to its system, it should have included that in its modeling, at a minimum, in its Modified IRP. As the Joint Comments by Intervenors stated, "the replacement of existing combustion turbines should be included in the IRP process to ensure that replacement, if necessary, meets the needs of the future system rather than provide a similar replacement to legacy assets."

Thank you for your time and please contact me with any questions.

Sincerely,



Dorothy Jaffe, Managing Attorney (*pro hac vice*)  
Sierra Club  
50 F St, NW Eighth Floor  
Washington, DC 20001  
E-Mail: [dori.jaffe@sierraclub.org](mailto:dori.jaffe@sierraclub.org)

<sup>3</sup> 40 CFR Part 423.19(f)(1).

<sup>4</sup> DESC May 24, 2021 Comments at 6-7.